

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SCOTT REIMER, individually and on behalf of all)
others similarly situated,) Case No. 08-CV-00411-NRB
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Plaintiff,) Electronically filed
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- against -)
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AMBAC FINANCIAL GROUP INC., ROBERT J.)
GENADER, PHILLIP B. LASSITER, SEAN T.)
LEONARD and THOMAS J. GANDOLFO,)
)
)

Defendants.)
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)

MARKO BABIC, individually and on behalf of all) Case No. 08-CV-01273-NRB
others similarly situated,)
)
)

Plaintiff,)
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)

- against -)
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AMBAC FINANCIAL GROUP INC., ROBERT J.)
GENADER, PHILLIP B. LASSITER, SEAN T.)
LEONARD and THOMAS J. GANDOLFO,)
)
)

Defendants.)
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(Captions continued on subsequent page.)

**NOTICE OF MOTION OF THE U.S. PUBLIC PENSION FUNDS FOR
(1) APPOINTMENT AS LEAD PLAINTIFF; (2) APPROVAL OF THEIR SELECTION
OF COUNSEL AS LEAD COUNSEL FOR THE CLASS; AND (3) CONSOLIDATION OF
ALL RELATED ACTIONS**

KEVIN PARKER, individually and on behalf of all others similarly situated,) Case No. 08-CV-01825-UA
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Plaintiff,) Electronically filed
)
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- against -)
)
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AMBAC FINANCIAL GROUP INC., ROBERT J.)
GENADER, PHILLIP B. LASSITER, SEAN T.)
LEONARD and THOMAS J. GANDOLFO,)
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Defendants.)
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MINNEAPOLIS FIREFIGHTERS' RELIEF) Case No. 08-CV-01918-UA
ASSOCIATION, individually and on behalf of all)
others similarly situated,)
)

Plaintiff,)
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- against -)
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AMBAC FINANCIAL GROUP INC., ROBERT J.)
GENADER, PHILLIP B. LASSITER, SEAN T.)
LEONARD and THOMAS J. GANDOLFO,)
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Defendants.)
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PLEASE TAKE NOTICE that on a date and at a time as designated by the Court, at the United States District Court for the Southern District of New York, located at the United States Courthouse, Courtroom 21A, 500 Pearl Street, New York, NY, 10007, the Public School Teachers' Pension & Retirement Fund of Chicago ("Chicago Teachers"), the Arkansas Teacher Retirement System ("Arkansas Teachers"), and the Public Employees' Retirement System of Mississippi ("Mississippi PERS," and collectively with Arkansas Teachers and Chicago Teachers, the "U.S. Public Pension Funds"), will respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), for entry of an Order (i) appointing the U.S. Public Pension Funds as Lead Plaintiff in the above-captioned actions; (ii) approving their choice of Bernstein Litowitz Berger & Grossmann LLP ("Bernstein Litowitz") and Kaplan Fox & Kilsheimer LLP ("Kaplan Fox") as Lead Counsel for the Class; and (iii) and consolidating all related actions herewith under Rule 42(a) of the Federal Rules of Civil Procedure.

The U.S. Public Pension Funds believe they have the largest financial interest in the relief sought by the Class and should, therefore, be appointed Lead Plaintiff. As a result of the misconduct and subsequent market correction as alleged in these actions, the U.S. Public Pension Funds suffered over \$31 million in losses on their investment in Ambac Financial Group, Inc. ("Ambac") securities.

The appointment of the U.S. Public Pension Funds would advance one of the primary goals of the PSRLA – to empower institutional investors with large financial stakes in the outcome of the litigation to assume control over securities class actions. In addition, the U.S. Public Pension Funds satisfy the requirements of Rule 23 of the Federal Rules of Civil Procedure because their claims are typical of the other class members' claims and the U.S. Public Pension

Funds will fairly and adequately represent the Class. Lastly, the U.S. Public Pension Funds have selected and retained law firms with extensive experience in litigating complex securities class actions to serve as Lead Counsel for the Class.

This Motion is based upon the accompanying Memorandum of Law in Support thereof, the Declaration of Gerald H. Silk filed herewith, the pleadings and other files, and such other written or oral argument as may be permitted by the Court.

For the foregoing reasons, the U.S. Public Pension Funds respectfully request that the Court (i) appoint the U.S. Public Pension Funds as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Exchange Act; (ii) approve the U.S. Public Pension Funds' selection of Bernstein Litowitz and Kaplan Fox as Lead Counsel for the Class; (iii) consolidate all related actions; and (iv) grant such other and further relief as the Court may deem just and proper.

DATED: March 17, 2008

New York, New York

Respectfully submitted,

By: /s/ Gerald H. Silk

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP
Gerald H. Silk (GS-4565)
Noam Mandel (NM-0203)
1285 Avenue of the Americas, 38th Floor
New York, New York 10019
Tel: 212-554-1400
Fax: 212-554-1444

Counsel to Public School Teachers' Pension & Retirement Fund of Chicago and Arkansas Teacher Retirement System and Proposed Lead Counsel for the Class

KAPLAN FOX & KILSHEIMER LLP
Frederic S. Fox
Joel B. Rodon
Donald R. Hall
Melinda D. Rodon

850 Third Avenue, 14th Floor
New York, NY 10022
Telephone: (212) 687-1980
Facsimile: (212) 687-7714

*Counsel to the Public Employees'
Retirement System of Mississippi and
Proposed Lead Counsel for the Class*